

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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<b>In re:</b>	:
	: Chapter 7
	:
<b>MELISSA L. CECOLINI,</b>	: Case No. 19-17459-mdc
	:
<b>Debtor.</b>	:
	:

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**RESPONSE IN OPPOSITION TO MOTION TO REDEEM**

Prudential Savings Bank (“Prudential”), by and through its counsel Obermayer Rebmann Maxwell & Hippel LLP files this Response in Opposition to the Motion to Redeem filed by Melissa Cecolini (the “Debtor”) and states as follows:

1. Denied. It is specifically denied that the property in question is tangible personal property, and strict proof is demanded upon a hearing.
2. Admitted.
3. Denied. Strict proof is demanded upon a hearing.
4. Denied. Strict proof of the ability to make payment from exempt funds is demanded upon a hearing.

WHEREFORE, Prudential requests the Court enter an order denying the Debtor’s Motion to Redeem.

Respectfully submitted,

Dated: February 20, 2020

By: /s/ Michael D. Vagnoni  
Michael D. Vagnoni, Esquire  
OBERMAYER REBMANN MAXWELL & HIPPEL LLP  
1500 Market Street Suite 3400  
Philadelphia, PA 19102  
215-665-3066 – Telephone  
*Counsel to Prudential Savings Bank*